

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Heather Mullins Williams, Debtor**

**Case No. 24-01335-JAW  
CHAPTER 13**

**RESPONSE**

COMES NOW, Debtor, by and through counsel, and responds to Trustee's Motion to Dismiss (dk # 38) as follows:

1. Debtor commenced this case on June 7, 2024 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. The Debtor is currently in the process of evaluating the feasibility of converting this case to a Chapter 7 pursuant to 11 U.S.C. § 1307(a).

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on July 1, 2025, to:

By Electronic CM/ECF Notice:

Harold Barkley

U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.